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SHARP CORPORATION and
SHARP ELECTRONICS CORPORATION

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: TFT-LCD (FLAT PANEL)
ANTITRUST LITIGATION

Master File No. 3:07-md-1827 SI
MDL No. 1827

This Document Relates To:
ALL ACTIONS

**STIPULATION AND [PROPOSED]
ORDER MODIFYING PRETRIAL
SCHEDULE FOR “TRACK ONE”
DIRECT ACTION PLAINTIFF AND
STATE ATTORNEY GENERAL
CASES**

The Direct Action Plaintiffs, Attorneys General, and Defendants party to the below-listed actions (collectively, “Parties”) hereby stipulate as follows:

STIPULATION

WHEREAS the Parties have met and conferred regarding the schedule set in the Court’s Order re: Pretrial and Trial Schedule (Dkt. 2165) (“Pretrial and Trial Schedule”);

WHEREAS the Parties agree to the extension of selected dates set in the Pretrial and Trial Schedule in order to allow sufficient time for discovery and related work;

1 WHEREAS the agreed upon revised pretrial schedule does not alter the dates set by
2 the Court for the last day for hearing dispositive motions, pretrial schedule, or trial(s);

3 NOW, THEREFORE, the Parties, through their undersigned respective counsel,
4 stipulate and request that the Court order as follows:

5 That the pretrial dates set forth in the Pretrial and Trial Schedule are amended,
6 solely as to the following cases:

- 7 • *ATS Claim, LLC v. Epson Electronics America, Inc., et al.*, Case No. 09-cv-1115
- 8 • *AT&T Mobility LLC, et al. v. AU Optronics Corporation, et al.*,
9 Case No. 09-cv-4997
- 10 • *Best Buy Co., Inc., et al. v. AU Optronics Corporation, et al.*,
11 Case No. 10-cv-4572
- 12 • *Costco Wholesale Corporation v. AU Optronics Corporation, et al.*,
13 Case No. 11-cv-0058
- 14 • *Dell Inc., et al. v. Sharp Corporation, et al.*, Case No. 10-cv-1064
- 15 • *Eastman Kodak Co. v. Epson Imaging Devices Corp., et al.*,
16 Case No. 10-cv-5452
- 17 • *Electrograph Systems, Inc., et al. v. Epson Imaging Devices Corp., et al.*,
18 Case No. 10-cv-0117¹
- 19 • *Motorola, Inc. v. AU Optronics Corporation, et al.*, Case No. 09-cv-5840
- 20 • *Nokia Corporation, et al. v. AU Optronics Corporation, et al.*,
21 Case No. 09-cv-5609
- 22 • *Target Corporation, et al. v. AU Optronics Corporation, et al.*,
23 Case No. 10-cv-4945
- 24 • *TracFone Wireless, Inc. v. AU Optronics Corporation, et al.*,
25 Case No. 10-cv-3205

27 ¹ This does not include the separate case, *Electrograph Systems, Inc., et al. v. NEC*
28 *Corporation, et al.*, Case No. 11-01690 (E.D.N.Y.).

- *State of Missouri, et al. v. AU Optronics Corporation, et al.*,

Case No. 10-cv-3619

- *State of Florida v. AU Optronics Corporation, et al.*, Case No. 10-cv-3517
- *State of New York v. AU Optronics Corporation, et al.*, Case No. 11-cv-0711
- *State of Oregon v. AU Optronics Corporation, et al.*, Case No. 10-cv-4346

That the pretrial dates set forth in the Order re: Pretrial and Trial Schedule are amended as follows:

Event	Dates Applicable to all Direct Action Plaintiffs and all State AG Plaintiffs (in cases on file by 12/1/10). per Pretrial and Trial Schedule, Dkt. 2165	[Proposed] Revised Dates
Disclosure of identities of plaintiffs' experts and one paragraph description of issues to be addressed by each expert	July 1, 2011	October 3, 2011
Disclosure of identities of all defendants' experts and one paragraph description of issues to be addressed by each expert	August 1, 2011	November 3, 2011
Plaintiffs and defendants each to provide one paragraph description of each issue/ subject of summary judgment motions (copies to be provided to the court)	January 27, 2012	March 1, 2012
Close of limited fact discovery unique to DAP and State AG cases	September 2, 2011	December 8, 2011
Service of opening expert reports for plaintiffs	September 9, 2011	December 15, 2011
Service of underlying data and code	September 12, 2011	December 19, 2011

Event	Dates Applicable to all Direct Action Plaintiffs and all State AG Plaintiffs (in cases on file by 12/1/10). per Pretrial and Trial Schedule, Dkt. 2165	[Proposed] Revised Dates
Parties to serve supplemental disclosure with one paragraph description of any additional issues/topics of summary judgment motions (copies to be provided to the court)	March 2, 2012	April 2, 2012
Service of opposition expert reports	November 8, 2011	February 20, 2012
Service of underlying data and code	November 11, 2011	March 1, 2012
Service of reply expert reports	January 9, 2012	April 27, 2012
Service of underlying data and code	January 12, 2012	April 30, 2012
Last day to file dispositive motions	May 18, 2012	May 25, 2012
Close of expert discovery	February 15, 2012	May 18, 2012
Last day to file oppositions to dispositive motions	June 15, 2012	June 22, 2012
Last day to file reply briefs in support of dispositive motions	July 13, 2012	July 20, 2012
Last day for hearing dispositive motions	August 15, 2012	August 15, 2012
Pretrial conference	October 9, 2012	October 9, 2012
Trial begins	November 5, 2012	November 5, 2012

PROVIDED THAT, the Parties reserve their right to seek further adjustments to the schedule of any specific case based on future developments upon good cause shown in that particular case. Further, the foregoing is without prejudice of the right of any Defendants and intervenors who have opposed a motion filed in any of the above-referenced actions for leave to amend the complaint to add new defendants and/or causes of action to seek further

1 extensions as appropriate in each case if such a motion is granted by the Court. Further,
2 Defendants and intervenors continue to maintain their oppositions to any such motions
3 pending before the Court.

4
5 Dated: July 8, 2011.

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13 By: /s/ Jacob R. Sorensen
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16 CORPORATION and SHARP ELECTRONICS
17 CORPORATION

18 With the approval of counsel for AU Optronics
19 Corporation; AU Optronics Corporation America; Chi
20 Mei Corporation; Chi Mei Optoelectronics USA, Inc.;
21 Chimei Innolux Corporation (f/k/a Chi Mei
22 Optoelectronics Corp.); CMO Japan Co., Ltd.;
23 Chunghwa Picture Tubes, Ltd.; Epson Electronics
24 America, Inc.; Epson Imaging Devices Corporation;
25 HannStar Display Corporation; Hitachi, Ltd.; Hitachi
26 Displays, Ltd.; Hitachi Electronic Devices (USA), Inc.;
27 LG Display Co., Ltd.; LG Display America, Inc.;
28 Nexgen Mediatech, Inc.; Nexgen Mediatech USA, Inc.;
Philips Electronics North America Corporation;
Samsung Electronics, Co., Ltd.; Samsung Electronics
America, Inc.; Samsung Semiconductor, Inc.; Samsung
SDI America, Inc.; Samsung SDI Co., Ltd.; Seiko
Epson Corporation; Tatung Company of America, Inc.;
Tatung Company; Toshiba Corporation; Toshiba
Mobile Display Co., Ltd.; Toshiba America Electronic
Components, Inc.; Toshiba America Information
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9 *Liaison Counsel for Direct Action Plaintiffs, on*
10 *behalf of the Direct Action Plaintiffs in the matters*
11 *listed above*

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By /s/ Nicholas J. Weilhammer
Nicholas J. Weilhammer

Co-Liaison Counsel for Attorneys General

26 ATTESTATION: Pursuant to General Order 45, Part X-B, the filer attests that concurrence
27 in the filing of this document has been obtained from the above-named parties.
28

[PROPOSED] ORDER

IT IS SO ORDERED.

July 12, 2011



The Honorable Susan Illston
District Court Judge